UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES

VS

1:11-CR-00186-01-S

JOSEPH CARAMADRE

MOTION FOR LEAVE TO WITHDRAW AS CO-COUNSEL OF RECORD

Now comes Robert D. Watt Jr., co-counsel of record to Joseph Caramadre, and seeks leave of the Court to withdraw his appearance. In support of said motion, it is stated:

- 1. Joseph Caramadre is in agreement with counsel's request.
- 2. Randy Olen, lead and continuing counsel, is in agreement with counsel's request.
- 3. Counsel is involved in matters revolving around his family which will resolve on or about Jly 6, 2013 and which have essentially prevented counsel from attending to the bulk of his practice since early March, 2013.

WHEREFORE, the premises considered, it is moved that the Court allow the withdrawal of Robert D. Watt Jr. as co-counsel of record for Joseph Caramadre.

JOSEPH CARAMADRE by his co-counsel,

/s/ Robert D. Watt Jr.

Robert D. Watt Jr. 84 Ship Street Providence, Rhode Island 02903 401-861-8810 401-453-4906 wattesq@aol.com

June 1, 2013

CERTIFICATION

I hereby certify that I did on the 1st day of June 2013 serve a true copy of the within motion on John McAdams, Esq. and Lee Vilker, Esq., Assistant United States Attorneys by the filing of the same utilizing the Court's electronic monitoring system.

/s/ Robert D. Watt Jr.